

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,
Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,
Defendants

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

**NOTICE OF FILING OF SUPPLEMENTED APPENDICES TO DEBTOR'S
VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

PLEASE TAKE NOTICE OF THE FOLLOWING:

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

1. On April 4, 2023, LTL Management LLC, the debtor in the above-captioned chapter 11 case (the “Debtor”) and the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), filed the *Debtor’s Verified Complaint For Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction* [Dkt. 1] (the “Complaint”) and the *Debtor’s Motion For an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction* [Dkt. 2] (the “PI Motion”) in the Adversary Proceeding.

2. On April 10, 2023, the Court entered the *Third Amended Ex Parte Temporary Restraining Order* [Dkt. 20] (the “TRO”).

3. Appendix A to the Complaint identifies the Defendants,² with the exception of the John and Jane Doe Defendants, and includes, among other things, the civil action number (where available) for each lawsuit and the law firms representing each of the Defendants on account of their talc claims. Appendix B to the Complaint identifies the Protected Parties.

4. The Debtor reserved the right to supplement, amend or otherwise modify Appendix A and Appendix B. Compl. ¶ 2, n. 3; PI Mot, 1, n. 1, 2; TRO ¶ 4.

² Capitalized terms not defined herein have the meaning given to them in the Complaint or the PI Motion, as applicable.

5. The Debtor hereby supplements Appendix A and Appendix B to the Complaint with the entities identified on Exhibit 1 and Exhibit 2 attached hereto, respectively. Appendix A has been supplemented to include subsequently filed cases as of April 14, 2023. Appendix B has been amended to include: (a) two additional nondebtor affiliates (Janssen Pharmaceuticals, Inc. and Kenvue Inc.), which are defendants in actions asserting Debtor Talc Claims commenced since the Court issued its temporary restraining order with respect to the other Protected Parties; and (b) an additional entity (Port Jervis Laboratories, Inc., f/k/a Kolmar Laboratories, Inc.) with alleged indemnification rights.³

³ For the avoidance of doubt, the inclusion of: (a) any party on Appendix A is not an admission that such party holds a currently pending claim against either the Debtor or a Protected Party; and (b) Port Jervis Laboratories, Inc., f/k/a Kolmar Laboratories, Inc. on Appendix B is not an admission that such entity's alleged indemnification right is enforceable.

Dated: April 17, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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